

UNITED STATES OF AMERICA
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554

In The Matter Of:)	
)	
Creation Of A)	FCC Docket No. RM-11287
Low Power AM Radio Service)	

REPLY COMMENTS OF
TALK RADIO OF PAHRUMP
TO
WRITTEN COMMENTS OF RANGEMASTER TRANSMITTERS, INC.

TALK RADIO OF PAHRUMP is a Part 15 AM broadcaster in Pahrump, Nevada. We serve a small but growing area roughly 40 miles northwest of Las Vegas. Since Area 51 is a prominent neighbor, for all we know our station we may have listeners on UFOs as well. (That's just a joke ... we *think*.)

In any event, like *many* of the Part 15 AM stations, we hope to become a Low Power AM Radio station someday. For this reason, we urge the Commission to *keep the process moving* toward a proposed rule to establish a new Low Power AM Radio Service. For the same reason, we are filing these Reply Comments to the Written Comments filed in this Docket by Keith Hamilton on behalf of his company, RANGEMASTER TRANSMITTERS, INC. of North Carolina.

RANGEMASTER TRANSMITTERS is dead wrong when it calls current Part 15 AM operations a full substitute for a Low Power AM Radio

Service. A lot of the company's Part 15 customers would take issue with that statement! Certainly, Part 15 AM stations perform a valuable service, and those Part 15 operators who don't want to move up to LPAM status should not be "bumped", *but* there are a lot of us in the Part 15 community who could do a whole lot more if we had more wattage.

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Now, RANGEMASTER TRANSMITTERS points out that Part 15 AM stations like ours *could* cover much larger areas -- without having to lose our Part 15 AM status -- if we just spread more Part 15 transmitters (perhaps sold to us by RANGEMASTER TRANSMITTERS?) all around our area. "It is possible to use multiple transmitters to cover a larger area", the company says.

Technically, RANGEMASTER TRANSMITTERS is right about that. However, he fails to mention some of the practical problems for a station like ours:

1. To cover our town with radio programming efficiently, we would have to obtain the use of multiple locations and then install a transmitter at each one. That means buying property or leasing property, and these days property isn't cheap. That's especially true here in Pahrump, where Boomtown Las Vegas is already spreading out tentacles and pushing up our real estate prices.

2. On top of buying or leasing the land for each site, and buying another transmitter for each site, we would *also* have to provide, at *each* site:

A radio tower

Some sort of radio receiver (so the transmitter would have some programming content to broadcast)

Electricity to run all this equipment

And

A building or other enclosed area where we could *put* all this equipment

3. Finally, we would have to buy a microwave system, with the right range, to send our programming content all over the town, for *each* of these “multiple transmitters” to receive and re-broadcast.

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All of this would constitute a huge duplication of equipment and facilities, many times over, when compared to putting up a single transmitter with enough wattage --

10 watts, 100 watts or Wattever -- to cover the whole town, all by itself.

Now, as we understand it, the Communications Act of 1934 tells the FCC to promote “*equitable and efficient*” use of the broadcast spectrum. The “equity” end of that hasn’t been getting too much attention from the Commission, or from Congress, over the last few decades. If you go along with the RANGEMASTERS idea that Part 15 AM stations should be pushed toward “multiple transmitters” instead of a single Low Power AM facility, then you’ll be leaving both “equity” *and* “efficiency” behind.

How many of the everyday Americans who run Part 15 AM stations can afford to lay out several thousand dollars for each of several transmitter sites? Asking us to do that, when the alternative of a 10-watt or 100-watt LPAM transmitter is staring all of us right in the face, isn’t fair to us -- and it sure isn’t efficient for us, either.

Having said all this, our station already owns two transmitters that we bought from Mr. Hamilton's company. We will probably even buy some more, once we cool down enough to forgive him for trying to kill our dreams.

There *is* a use for those Part 15 AM transmitters that we've been buying from RANGEMASTER TRANSMITTERS. However, the best use isn't a scattered spread for covering an area like Pahrump. Where the transmitters make sense is in the small desert towns nearby. There, a town can be covered by *one* Rangemaster transmitter.

There are a lot of towns like that across America, in the desert and out of it, and there are compact urban neighborhoods, too. So there *are* many places where a Part 15 operator can be "the local station" for the whole town.

This means Mr. Hamilton's company isn't going to run out of markets for its transmitters anytime soon.

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Here in Pahrump, however, we'd sure appreciate it if Mr. Hamilton's company would "work the beat" in places where Part 15 transmitters are powerful enough to get the job done -- and let stations in places like ours move up to LPAM status.

You know, LPAM stations might buy equipment from RANGEMASTER, too.

First off, though, we've got to get licensed -- and we can't get licensed until the Commission sets up a Low Power AM Radio Service.

So, *please*: Disregard Mr. Hamilton's company and *keep the process moving*.

Please keep the Part 15 stations alive, but make room for LPAM stations, too. We're sure you folks at the FCC are smart enough to do both when you write your proposed and final rules.

Respectfully submitted,

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Dated: November 10, 2005

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I hereby certify that a copy of these Reply Comments has been sent to:

Keith Hamilton

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Harvey Caplan
2005

November 10,